Rocky Flats Citizens Advisory Board Recommendation 98-20

to the U.S. Department of Energy

Regarding the Draft Surplus Plutonium Disposition Environmental Impact Statement

Approved October 1, 1998

Background:

Since ending a weapons production mission early this decade, the Rocky Flats site has been host to over fourteen tons of weapons grade plutonium in a variety of forms. These forms include plutonium pits and associated parts, unfabricated plutonium metal, plutonium oxide, residues, and wastes. To achieve closure of the Rocky Flats site, these materials will eventually need to be removed to other sites for final disposition.

In a previous document, the Storage and Disposition of Weapons Useable Fissile Materials Environmental Impact Statement, and subsequent Record of Decision, DOE determined it would pursue two strategies for the disposition of excess plutonium at Rocky Flats and other sites. The first of these strategies call for some of the less pure materials to be immobilized by ceramification, after which the ceramified materials would be placed in containers. These containers would then be placed in a larger container that would be filled with vitrified high level waste. These containers are planned for disposal in DOEOs proposed high level waste repository at Yucca Mountain in Nevada. For purer forms of plutonium, DOE will pursue a path to convert the material into mixed oxide (MOX) fuel that would then be burned in a nuclear reactor for power generation. Following burning in a reactor, the resulting spent reactor fuel would also be sent to DOEOs Yucca Mountain facility.

In the current document available for public review and comment, the Draft Surplus Plutonium Disposition Environmental Impact Statement, DOE is going one step further in its planning by suggesting its preferred alternatives for where plutonium immobilization and MOX fuel fabrication will be located. DOE has identified the Savannah River Site in South Carolina as its preferred choice for both immobilization and MOX fuel fabrication. In the EIS, DOE also describes the need to construct a plutonium pit disassembly facility, listing both Savannah River and the Pantex facility in Texas as likely candidates. DOE has not identified which of these two sites it prefers at this time.

The Rocky Flats Citizens Advisory Board has reviewed the Draft Surplus Plutonium Disposition EIS and developed the following comments and recommendations.

Recommendations:

- 1. The Rocky Flats Citizens Advisory Board (RFCAB) supports DOE in its decision to remove plutonium and special nuclear materials from the Rocky Flats site. The Board is concerned that these materials be handled, transported and processed as safely and responsibly as possible. The Board does not support the No Action Alternative as described in the EIS, which would call for continued storage of the materials in old and unsafe buildings at Rocky Flats. The Board supports expeditious and safe disposition of these materials and is concerned that disposition occur in as safe and responsible manner as possible.
- 2. When DOE makes its final selection of the site or sites to process these materials, RFCAB recommends that the following criteria be considered:
 - that there is broad support in the local community for the new facilities;
 - that DOE pledge to mitigate intersite equity issues by providing the host communities assistance for any infrastructure modifications such as transportation corridor improvements;
 - that any adverse economic, social, environmental, and worker health and safety impacts are minimized;
 - that DOE pledge to continued public involvement in the design, construction, operation and eventual dismantlement of any new facilities;
 - that the new mission fit in with whatever current mission is being conducted at the chosen site; and
 - that new areas of contamination be minimized to the greatest extent possible.
- 3. Because of the range of uncertainties, both political and technical, which must be overcome before any plutonium disposition plans are realized, RFCAB recommends that DOE develop and be prepared to implement in a timely manner contingency plans should longer term storage of plutonium at Rocky Flats become a necessity. Regular progress reports should be made to the Board and local community concerning the availability of new facilities and the movement of materials from Rocky Flats.

The Rocky Flats Citizens Advisory Board is a community advisory group that reviews and provides recommendations on cleanup plans for Rocky Flats, a former nuclear weapons plant outside of Denver, Colorado.

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